

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

July 25, 2022

United States of America

v.

Daylen Jordan Edwards

Case No. **4:22-mj-1663**

Nathan Ochsner, Clerk of Court

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

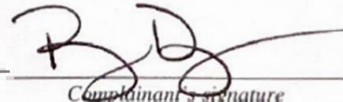
On or about the date(s) of 7/22/2022 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section	Offense Description
18 U.S. Code § 1708	Theft or Receipt of Stolen Mail Matter
18 U.S. Code § 1704	Keys or Locks Stolen or Reproduced

This criminal complaint is based on these facts:

Please see attached Affidavit by Postal Inspector Rahiza Diaz-Vargas in support of this Criminal Complaint.

☒ Continued on the attached sheet.



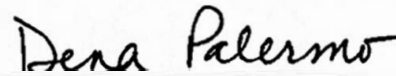
Complainant's signature

Rahiza Diaz-Vargas, Postal Inspector

Printed name and title

Sworn to before me telephonically.

Date: 07/23/2022



Judge's signature

City and state: Houston, TX

Dena Hanovice Palermo, U.S Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

STATE OF TEXAS:

Case No. **4:22-mj-1663**

:
:
:
:

COUNTY OF HARRIS

AFFIDAVIT

I, Rahiza Diaz-Vargas, being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector (PI) with U.S Postal Inspection Service (USPIS) and has been so employed since February 2013. Affiant is currently assigned to the USPIS Mail Theft/Mail Fraud Team, which is tasked with the investigation of complex mail theft crimes, including but not limited to, mail theft, credit card fraud, money order fraud and identity theft. Affiant has gained experience in conducting such investigations through on the job training and participation in criminal investigations. Affiant has personally participated in investigations involving violations of federal law regarding mail theft and criminal groups that result from such unlawful activity. As Postal Inspector, Affiant is authorized to investigate violations of the United States and to seek forfeiture of property under authority of the United States.
2. This Affidavit is submitted in support of a criminal complaint charging Daylen J. Edwards (hereinafter **Edwards**) with committing a violation of Title 18 U.S.C. § 1708 Theft or Receipt of Stolen Mail Matter and Title 18 U.S.C. § 1704, Keys or Locks Stolen or Reproduced in the Southern District of Texas.
3. I based the information in this affidavit on my personal knowledge and on information that I have learned, either directly or indirectly, from witnesses, records, and other law enforcement officers and agents. Additionally, unless otherwise indicated, conversations

discussed herein are described in substance and part rather than verbatim. Likewise, I have not included each and every fact that my investigation has revealed, but rather, have included only those facts necessary to show probable cause that Noah Mendoza has committed violations of federal law.

BACKGROUND ON SUBJECT

4. Daylen Jordan Edwards is a Black male who was born in Missouri on August 18, 1997.

PROBABLE CAUSE

5. On or about January 2022, US Postal Inspection Service (USPIS) received several mail theft complaints from victims stating their checks were stolen from the collection box located at 13188 Memorial Dr. Houston, TX 77079.

6. On April 13, 2022, USPIS surveillance cameras were installed at 13188 Memorial Dr. facing the USPS blue collection box to capture anyone stealing the mail.

7. On Monday April 18, 2022, at approximately 0349 hours, the surveillance footage shows a dark colored Jeep Grand Cherokee, bearing Missouri license plate number VG0-E1S, approach the collection box located at 13188 Memorial Dr. Houston, TX 77079. A black male, fitting the description of **Edwards**, exits the passenger side of the vehicle, opens the collection with a key, takes out the tub to check if there is any mail, puts it back in the collection box and closes it. The suspect is a B/M wearing a t-shirt, sweatpants, tennis shoes and a cloth covering his head and neck.

8. On April 29, 2022, I check the DMV information of the Missouri license plate number VG0-E1S. The vehicle is registered to **Daylen J. Edwards** at 1118 Collingwood Dr., Saint Louis MO 63132; VIN 1C4RJFCT6EC125152.

9. On Monday May 16, 2022, at approximately 0447 hrs., the surveillance footage shows the same dark colored Jeep Grand Cherokee, bearing Missouri plate number VGO-E1S, approach the collection box located at 13188 Memorial Dr. Houston, TX 77079. The same B/M from the 4/18/2022 surveillance video, exits the passenger side of the vehicle, opens the collection, steals the mail and closes it. The suspect has shoulder length braids/dread locks, wearing a t-shirt, sweatpants and tennis shoes.

10. On June 6, 2022, at approximately 1000 hrs., I installed a key catcher at the collection box located at 13188 Memorial Dr. Houston, TX 77079, with the purpose of seizing the keys and arrest the suspects at the scene.

11. On June 6, 2022, at approximately 0441 hrs., the surveillance footage shows the same dark colored Jeep Grand Cherokee, bearing Missouri plate number VGO-E1S, approach the collection box located at 13188 Memorial Dr. Houston, TX 77079. The same B/M from the previous surveillance videos, exits the passenger side of the vehicle, tries to open the collection box using a key but is not able to get inside the collection box. The suspect walks back to the vehicle and then returns to the collection box to try again. The key catcher did not work and the suspect took the key. The suspect gets in the vehicle, and they drive off west on Memorial Drive.

12. Postal Inspector Diaz-Vargas was watching the live feed of the surveillance cameras and immediately notified HPD Westside dispatch of a theft in progress.

13. I reviewed the Harris County Constable's Office (HCCO), Precinct 5 incident report #2206-00164 and learned:

14. At approximately 04:42 am, Deputy Lackings Unit 5D31, received Intel from Sergeant Goff Unit 5S88, whom was in contact with Inspector Diaz, who advised the suspected vehicle was leaving the location, after attempting to break into the mailbox for a fourth time. Officer

Lackings observed the vehicle exiting the parking lot, located at 13188 Memorial Drive, a public roadway in Harris County, Texas. The traffic stop was initiated in the approximate 13100 block of Memorial Drive, westbound lanes. The vehicle, a black in color 2014 Jeep Cherokee, bearing Missouri License Plate VG0E1S, VIN 1C4RJFCT6EC125152; evading for approximately 2.4 miles. Deputy Lackings then observed the driver and front passenger, exit the vehicle and proceed to run west from the stopping location, ultimately abandoning the motor vehicle. The driver failed to place the vehicle in park, which subsequently caused the vehicle to slow roll across the southbound lanes and ultimately entering into the Memorial Collision parking lot, located at 739 South Dairy Ashford Road. The vehicle came to a complete stop, after crashing into a parked, white, Jeep Patriot, bearing Texas License Plate NVT3980.

15. While pursuing both fleeing occupants on foot, Deputy Lackings observed both occupants jump a wooden fence; which led into the Memorial Ashford Townhouse complex, located at 14717 Pertshire Road. A perimeter was quickly established, which led to the apprehension of the driver, whom was later identified by Texas Driver's License 47622484, as Christopher Crump, by Deputy Siller Unit 5V29. Deputy Siller, along with HPD Officers, located Crump on the west side of the complex, hiding within a set of bushes. At approximately 05:28, Crump was detained without incident. Houston Fire Department arrived on scene at approximately 05:46 am and cleared Crump on scene. Deputy Siller transported Crump back to the original location, where the investigation continued.

16. While searching for both occupants, Deputy Perrett Unit 5H18, Deputy Hernandez Unit 5H25 and I began searching the vehicle. During the course of the search, two loaded firearms were located on the driver's side. One firearm was positioned on the driver's seat and the second firearm was found in the driver's door. Both Glock 19 firearms, serial numbers (BDMC855) &

(BVG709), were cleared TCIC/NCIC, by Precinct 5 Dispatch. Also, on the driver's side of the vehicle was found two, sealed ziplock styled bags of Hybrid medical marijuana (7 grams-Cheetos & 7 grams-RS33). Located on the passenger's seat was 4, white capsule shaped pills; with the imprint of (10/325) & (WES 203), stored inside of a clear sandwich bag. Located inside of the vehicle was an array of stolen mail, checks and credit cards from possibly multiple locations, which would acquire additional charges, if complainants are willing to pursue charges. I attempted to conduct a Mirandize interview to Crump but he invoked his right to a lawyer.

17. Deputy Lackings then contacted the District Attorney's Office and appraised ADA A. Perez of the facts, who ultimately accepted charges for State Jail Felony PCS, Penalty Group 1, UCW and Evading (Motor Vehicle). Mr. Crump was placed into custody at 06:23 am and transported Mr. Crump to the Joint Processing Center, located at 700 San Jacinto, at approximately 06:34 am, where he was booked and released to the jailers of Harris County. The passenger was not apprehended.

18. That same day, I took custody of the mail, checks, credit cards, other documents and Crump's cell phone found inside the suspect's vehicle. I transported the evidence to USPIS DHQ located at 4600 Aldine Bender Dr. Houston, TX 77315. Crump's cell phone was placed on airplane mode and placed inside a faraday box charging to later get a search warrant. Mail was placed in a postal tub to be sent to the lab for fingerprints.

19. On June 14, 2022, I packaged and sent the mail found inside the 2014 Jeep Cherokee to the lab for fingerprint analysis. I also found a camouflage balaclava, which was worn by the passenger when stealing the mail on June 6, 2022, for DNA analysis.

20. On July 22, 2022, at approximately 7:00 AM, Postal Inspector Nicholas Underhill and I were notified of two individuals that were arrested by the Jersey Village Police Department

(JVPD). Inspector Underhill and I arrived at the JVPD Station at approximately 8:30 AM and met up with Lieutenant Heath Hawley. Lt. Hawley provided me with a draft of police report 2022-00009337, related to Daylen J. Edwards and DeAndre Bradley's arrest. I reviewed the report and learned:

21. On 7/22/2022, at approximately 1:00 AM, Officer Garcia was patrolling the area of Jersey Drive and Lakeview Drive and observed a white Mercedes with license plate number PTC0396. Officer Garcia ran the license plate in his car computer. The return showed the registration expired on June of 2022.

22. Officer Garcia caught up to the vehicle on Senate Avenue as it crossed Dillard Drive. Officer Garcia found it suspicious as the vehicle was returning back to the Westbound Northwest Service Road, the road they had just left. As the vehicle approached Northwest Freeway Service Road, Officer Garcia initiated a traffic stop by turning on my overhead emergency lights on Senate and westbound Service Road.

23. As the vehicle was coming to a stop, Officer Garcia noticed that the vehicle was occupied by at least a front seat passenger. The front seat passenger appeared to be reaching within the vehicle. Officer Garcia knocked on the window, the front passenger window rolled down, and asked the driver to roll down the rear window. Officer Garcia could not see in the vehicle due to the extreme dark tint. Once the window rolled down, Officer Garcia confirmed the vehicle was just occupied by two young black males; driver and front passenger. Officer Garcia asked both of them to place their hands on the dash.

24. Officer Garcia explained to them the reason for the stop was because of the expired registration. Officer Garcia asked both the driver and passenger if they had any identification and the passenger said he did not. The driver told me he had his driver's license on his phone. Officer

Garcia asked the front driver to grab his phone and step out of the vehicle, so he could see it.

Officer Garcia noticed that the front passenger's facial expression change and he looked over to the driver.

25. Once the driver reached the front of the vehicle, Officer Garcia asked him if he had any weapons on him. He then told me that he had a gun under his front driver's seat. Officer Garcia asked him to turn around and placed him in handcuffs. Officer Garcia explained to him that he was just detained.

26. Officer Garcia then noticed the front passenger lunge to the driver's seat and saw the brake lights come on as he was going to put the vehicle in gear. Officer Garcia yelled at him and told him not to leave. Officer Garcia moved back towards the vehicle, while holding on to the front driver. Officer Garcia had the driver lay on the ground. Officer Garcia pulled out my service weapon and held the front passenger at gun point until back up arrived.

27. Moments later Sergeant Rodriguez arrived at my location to assist Officer Garcia. Sgt. Rodriguez got the front passenger, now in the driver's seat. Sgt. Rodriguez placed him in handcuffs and got him out of the vehicle. Officer Garcia placed the front passenger in the back seat of Sergeant Rodriguez' patrol vehicle. Officer Garcia placed the driver in the backseat of his patrol vehicle.

28. Officer Garcia was able to identify the driver as Deandre Bradley, a black male with a date of birth of 2/15/2001 by a Texas Driver's License. Officer Garcia asked Bradley who the front passenger was. Bradley told Officer Garcia that he did not know his name and had only known him for a couple of months. Bradley was driving a white 2016 Mercedes-Benz with license plate number PTC0396.

29. Officer Garcia then spoke with the front seat passenger, who self-identified as **Daylen Edwards**, a black male, with a date of birth of 8/18/1997. **Edwards** told Officer Garcia he only lived in Texas for a couple of months and was from Missouri. Officer Garcia asked **Edwards** what the name was of the driver, and he told me that he did not know him. Officer Garcia asked **Edwards** if they had nicknames and he told me that he did not know. Officer Garcia asked **Edwards** if he had ever had a job and he told me he had. Officer Garcia then asked **Edwards** for his social security number and he told Officer Garcia that he was not going to give him that information. Since **Edwards** did not have a picture identification, Officer Garcia have used social security numbers to verify individual's identity.

30. Officers found inside the vehicle a US Postal Service Arrow Key, with serial number 56 6560, and a handgun hidden under the driver's seat; the handgun was a black Glock 48 with serial number BMMV958, not in a holster. Also in the vehicle was 6.2 grams of Marijuana, a suitcase in the vehicle's trunk containing a "Scream" Mask, and 85 pieces of mail, with various victims' names in the front passenger seat and the rear seat. Some of the mail included checks that were to be sent as payments.

31. Officer Garcia located in the vehicle a fake Texas license plate in the vehicle, 14657A3. Officer Garcia provided dispatch with the license plate number and they told me it did not return to any vehicle. From Officer Garcia's experience as a law enforcement officer, he has come to know that fake license plates are commonly used to commit crime as a way to avoid law enforcement finding them. The license plate is easily attached to the vehicle with clear tape and is also easily removed.

32. Officer Garcia contacted the Harris County District attorney's office and spoke with A.D.A B. Daniels who accepted the charge of unlawful carry of a weapon for Bradley and

Attempted Evading (state jail felony) for Edwards. Officer Garcia transported Bradley to the city jail for processing. Officer Aldava Transported **Edwards**.

33. At the police department Officer Garcia contacted the United States Postal Inspection Service. Inspector Nicholas Underhill and I responded to the Jersey Village Police Department to interview Edwards and Bradley.

34. I Reviewed the evidence and observed the USPS arrow key number (56 6560), which is the same key series that opens Memorial Drive area collection boxes. I also observed the 85 pieces of mail seized by JVPD from inside the vehicle, and the mail appeared sealed with no postmark. Based on this info, I know mail without postmark are placed into USPS collection boxes or mailboxes with the intent to be delivered to the intended recipients. I also observed that none of the mail had the sender or recipients name of “De’ Andre Bradley” or “**Daylen Edwards**”.

35. Inspector Underhill and I attempted to conduct a Mirandized interview to Bradley and **Edwards**. Bradley invoked his right to a lawyer and **Edwards** did not want to speak with us.

36. Afterwards, Inspector Underhill and I transported **Edwards** to the Federal Detention Center. Bradley was later booked at the Harris County Jail Processing Center.

37. On July 22, 2022, at approximately 12:00 PM, I received an email stating the lab request for fingerprint was complete. I reviewed the lab report 9-444-020259(2, 4) and these were the findings and opinions:

38. The latent prints were compared to Exhibits K-1 and K-2 and searched in the FBI’s automated database resulting in the following identifications:

39. **Daylen Jordan Edwards, FBI No. 8355RAD5P, Exhibit K-1**

- One fingerprint on Exhibit 2, check # 118

- One fingerprint on Exhibit 2, check # 7327
- One fingerprint and one palm print on Exhibit 2, check # 7328
- Two fingerprints on Exhibit 2, check # 15605
- One palm print on Exhibit 3, exterior of an envelope to Disability and Life Claims
- Three fingerprints on Exhibit 3, exterior of an envelope to Midland Credit Management
- One fingerprint on Exhibit 3, exterior of an envelope to Core Studio, LLC
- One palm print on Exhibit 3, exterior of an envelope to World Video Bible School
- Three fingerprints on Exhibit 3, exterior of an envelope to Poerio, Inc.
- Two fingerprints on Exhibit 4, exterior of packages to Bruce Wyatt
- One fingerprint on Exhibit 4, exterior of an envelope to Wolf Family

40. **Christopher Michael Crump, FBI No. R9PAX9PAT, Exhibit K-2**

- One fingerprint on Exhibit 3, exterior of a birthday card

CONCLUSION

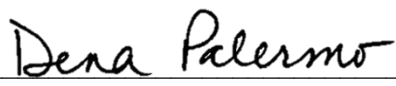
41. Based on the foregoing facts and circumstances, I respectfully submit there is probable cause to believe that from April 2022 to July 2022, within the Southern District of Texas, **Daylen Jordan Edwards** committed violations of Title 18 U.S.C. § 1708 Theft or Receipt of Stolen Mail Matter and Title 18 U.S.C. § 1704, Keys or Locks Stolen or reproduced in the Southern District of Texas.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'RD' with a large flourish underneath.

Rahiza Diaz Vargas
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to me telephonically this ____ day of July 23, 2022 at _____ a.m./p.m. in
Houston, Texas.



Dena H. Palermo
United States Magistrate Judge